

# Holland & Knight

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December 28, 2023

## **Via ECF**

The Honorable Steven L. Tiscione, U.S.M.J.  
United States District Courthouse, Eastern District of New York  
100 Federal Plaza, Central Islip, New York 11722

**Re: Patrick Guidice, et al. v. Out-Look Safety, LLC, 22-CV-2877 (Tiscione, M.J.)**

Dear Judge Tiscione:

Holland & Knight represents Out-Look Safety (“Out-Look”) in this matter. We write to the Court responding to the status of Defense counsel’s contact with Joseph Celso, President of Out-Look. Out-Look’s communication with my firm is extremely limited. I am informed that Mr. Celso was recently convicted of federal crime and has been remanded by the U.S. Attorney’s Office and the Department of Justice for certain violations and is now incarcerated in a federal facility in Brooklyn, NY. I have phoned Mr. Celso’s last known mobile phone number, but no one has answered my calls and I cannot leave a message as the voicemail box is full and cannot accept any messages. Out-Look’s business number is out of service as well.

As noted previously, Out-Look is currently indebted to Holland & Knight LLP for a very large amount of legal fees for this litigation, and Out-Look has never paid any of its legal bills from my firm. We respectfully request that the Court allow defense counsel to withdraw, and my sole contact with Out-Look, Paul Tantillo has indicated that Out-Look continues not to object to our withdrawal and understand that they will need to retain new counsel. Accordingly, Defense counsel seeks the Court’s permission to withdraw and a stay of the motion for a default judgement.

Respectfully,  
**HOLLAND & KNIGHT LLP**  
Attorneys for Out-Look Safety, LLC  
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